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THE WILDERNESS SOCIETY

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RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE.

DEC 01 1997

Dr. Christopher Servheen
U.S. Fish and Wildlife Service
Project Leader, Bitterroot Grizzly Bear DEIS
P.O. Box 5127
Missoula, MT 59806

Dear Dr. Servheen,

Thank you for this opportunity to comment on the Bitterroot Grizzly Bear DEIS and the effort to restore viable populations of grizzlies to the Northern Rockies. These comments are filed on behalf of the Idaho and Northern Rockies Offices of The Wilderness Society.

The Wilderness Society (TWS) has been extensively involved in the efforts to recover the grizzly throughout the Northern Rockies. We appreciate the U.S. Fish and Wildlife Service's efforts in examining different ways in which to restore a population of grizzlies to the Bitterroot ecosystem. While TWS supports restoration of the grizzly in the Bitterroot ecosystem particular problems in each of the alternatives presented in the DEIS prevents TWS from supporting any of the alternatives as written. TWS hopes that the Fish and Wildlife Service will extensively revise the DEIS prior to publication of the final EIS to correct the deficiencies which are outlined below.

Non-essential experimental status

1 The DEIS proposes to classify re-introduced grizzlies as "non-essential, experimental." TWS does not support this approach because the DEIS admits that under this classification the agency is forbidden from fostering any connections between a Bitterroot population and other populations in the Northern Rockies. The idea that grizzly recovery can occur by focusing simply on individual, isolated populations is a mistake the Fish and Wildlife Service continues to make. By relying on a handful of small, isolated populations to achieve grizzly recovery, the Fish and Wildlife Service violates every rule that population viability analysis has taught about the general requirements for long-term



viability. It confuses short-term stabilization with long-term recovery and will produce neither.

- 2 Any plan for long-term recovery of the grizzly in the Bitterroots, and indeed in the entire Northern Rockies, must include identification of potential linkage zones between the isolated populations in order to facilitate the likelihood of genetic interchange between the populations. The final EIS should identify such existing or potential linkage zones or corridors and make recommendations to the public land managers on how to best maintain or restore them to a functional capacity. Unless linkages between the grizzly populations can be established there is little long-range hope for maintaining the species in the region.

Recovery Area Boundary

- 3 The proposed recovery area boundary coincides with the boundaries of the Selway-Bitterroot and Frank Church-River of No Return Wilderness Areas. This appears to be a case of establishing a recovery area based on political expediency and not on the biological needs of the bear. TWS believes that the area north of Highway 12 and the Lochsa River should be included within the recovery area since it is apparent that this region likely contains a great deal of high quality bear habitat, particularly in the Mallard-Larkins, Weitas Creek, Upper North Fork/Meadow Creek and Great Burn roadless areas. Furthermore, the roadless national forest lands adjacent to and surrounding the two large designated wilderness areas should also be considered for inclusion in the recovery zone.

Management Authority

- 4 The U.S. Fish and Wildlife Service should retain full management authority for recovery of a grizzly population in the Bitterroot ecosystem. While the Scientific Committee and the Citizen Committee featured in two of the alternatives in the DEIS may be desirable in an advisory role, the Fish and Wildlife Service remains the best entity to keep the interests of grizzly recovery first and foremost in its efforts. The recovery effort should seek the full involvement of the state fish and game departments as well as the Nez Perce Tribe.

Sources of Transplant Bears

- 5 TWS will not support under any circumstances the use of grizzlies from the Northern Continental Divide or Greater Yellowstone ecosystems as "transplant stock" for a Bitterroot recovery effort. The DEIS implies that transplant bears will come from other populations in the Northern Rockies "where current grizzly populations are healthy enough to sustain removal of a few bear per year over a 5 year period." The DEIS also asserts that "these areas have habitat similar to the (Bitterroot Ecosystem) and have sufficient numbers of bears to be a source area, and a limited surplus between existing human-caused mortality levels and management plan mortality limits."

The lack of logic in these assertions is almost laughable. The grizzly is listed as a "threatened" species in the Northern Rockies. By definition this means these populations are not "healthy." TWS must also remind the Fish and Wildlife Service that its technique

of counting bears (and therefore its determination of the status of grizzly populations as well as acceptable mortality limits) was struck down in court as arbitrary and capricious. TWS does believe the Fish and Wildlife has a defensible population estimate of either the Northern Continental Divide or Greater Yellowstone populations, nor does TWS believe that the Fish and Wildlife Service knows "acceptable" mortality levels or limits.

Furthermore, total and female mortality limits have been exceeded in Yellowstone for three consecutive years, while in Glacier total and female mortality limits were broken in 1992 and female limits again in 1995. Recently the Fish and Wildlife has attempted to "cook the books" in figuring mortality levels by calculating these levels as six-year running averages rather than annually. This approach was not put done in the Recovery Plan or the scientific study upon which the limits are based. This "accounting" procedure resembles the U.S. Forest Service's efforts to justify its money-losing timber program in the Northern Rockies. Both are trying to paint a rosy picture of a dismal situation, and both are dishonest ways to try to convince the public that everything is just fine.

Wildlife Management Standards

The preferred alternative in the DEIS adopts the existing wildlife management guidelines for elk from the national forest management plans and applies them to grizzly management. TWS is not convinced these standards are adequate over the long-term for elk, let alone grizzlies. Be that as it may, it is not scientifically defensible to take a set of management guidelines developed for one particular wildlife species and apply them blindly to management of another. Grizzlies have unique habitat needs and requirements. A recovery plan should reflect those needs and contain grizzly-specific management standards.

6 | Similarly, the preferred alternative states that road density guidelines in the management plans for the Clearwater and Nez Perce Forests are "assumed" to be adequate for grizzly recovery. Again, the recovery plan cannot assume that existing management strategies which were not developed for grizzly recovery will actually lead to recovery. Road densities in the recovery area should be based on grizzly recovery, not pre-existing standards which were not based on recovery needs for the grizzly.

7 | The proposal to close the Magruder Corridor in one of the alternatives is at best premature. There is no explanation as to why this road is singled out for immediate closure, while other roads in an expanded recovery area -- the Lolo Motorway, the Toboggan Ridge Road, or even the North Fork Clearwater River Road to name just a few-- are not addressed. Road closures to facilitate grizzly recovery should be based on specific problems that specific roads might create for the recovery effort.

Education Efforts

8 | Any grizzly recovery effort in the Bitterroot ecosystem will require a long-term commitment on the part of the Fish and Wildlife Service to educate landowners and

communities on the needs of the bear. Food storage and camp maintenance guidelines must be developed with outfitters and guides, as well as garbage handling techniques for property owners and small communities adjacent to and within the recovery area. Federal assistance should be made available to help implement these programs.

Summary

In closing, the Bitterroot grizzly DEIS contains what may be thought as many "politically correct" ideas and very little actual grizzly bear science. While TWS acknowledges the need to factor in "real world" concerns into the recovery of threatened and endangered species, this DEIS contains so little valid science that TWS cannot support the document as written. TWS supports recovery of the grizzly in the Bitterroot ecosystem, and hopes that the Fish and Wildlife Service will develop for the final EIS a recovery plan which truly fosters recovery of the grizzly not only in the Bitterroots but in the Northern Rockies as well.

Please send this office a copy of the final EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Gehrke", written in a cursive style.

Craig Gehrke
Regional Director